

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JARED BEATTY,)	
)	
Plaintiff,)	
)	
vs.)	No. 3:09-cv-795-JPG-CJP
)	
OLIN CORPORATION,)	PLAINTIFF DEMANDS
)	TRIAL BY JURY
Defendant.)	

COMPLAINT

COMES NOW the Plaintiff, JARED BEATTY, by and through his undersigned attorney,
and for his Complaint against Defendant, OLIN CORPORATION, states as follows:

1. Jurisdiction is properly invoked in this Court pursuant 28 U.S.C. §1332.

The parties are citizens of different states and the amount in controversy is in excess of
\$75,000. (Diversity Jurisdiction)

2. Venue is proper in this judicial district as the unlawful employment practices
alleged were committed within this judicial district.

3. Plaintiff is a resident and citizen of the State of Illinois.

4. Defendant is a Virginia corporation and its principal place of business, its
headquarters, is in Clayton, Missouri.

5. Plaintiff was employed by defendant in July 2004 in the City of East Alton, in the
State of Illinois.

6. Plaintiff was injured on the job on September 27, 2007 and filed a claim for
worker's compensation.

7. Plaintiff was off work pursuant to a doctor's note.

9. By letter dated November 16, 2007, defendant terminated plaintiff's employment.

9. Defendant terminated plaintiff's employment in retaliation for and as a direct result of plaintiff having suffered one or more work- related injuries while employed by defendant, and as a result of plaintiff's filing and/or asserting his statutory rights under the Illinois Worker's Compensation Act.

10. Defendant, by letter dated November 16, 2007, manufactured and articulated false and pretextual reasons for the termination of plaintiff's employment. A finder of fact, once having determined that the reasons given by defendant for terminating plaintiff's employment to be false and pretextual, will find that the real reason is the illegal and retaliatory one.

11. Termination of plaintiff's employment in retaliation for plaintiff's asserting/relying upon his statutory worker's compensation rights violates the strong public policy of the State of Illinois.

12. As a direct and proximate result of defendant's retaliation against plaintiff, plaintiff has lost wages, income, benefits, and employment opportunities.

13. Defendant's conduct in terminating plaintiff's employment in retaliation for his asserting his statutory Worker's Compensation Rights warrants the imposition of punitive damages against defendant.

14. Plaintiff suffered and continues to experience emotional distress, humiliation, embarrassment, and emotional pain as a result of defendant's retaliatory termination of plaintiff's employment.

15. As a direct and proximate result of defendant's retaliatory termination of plaintiff's employment, plaintiff has incurred liability for costs and expenses in pursuing this matter, and pursuant to statute, is entitled to recovery of these costs and expenses.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award plaintiff lost wages and benefits, and other compensation, proximately caused by defendant's illegal and retaliatory conduct;
- B. Award plaintiff compensation and punitive damages in excess of \$75,000;
- C. Award plaintiff his reasonable costs, expenses, and expert fees; and
- D. Award such other and additional relief as this Court deems proper and just.

JARED BEATTY

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